

1 Hon. Barbara J. Rothstein
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 JASON FUHR, INDIVIDUALLY, and AS
10 EXECUTOR OF THE ESTATE OF SHAUN
FUHR,

11 Plaintiffs,

12 vs.

13 CITY OF SEATTLE, and NOAH ZECH

14 Defendants.

15 No. 2:23-cv-00600 BJR

16 STIPULATED MOTION AND ORDER TO
17 EXTEND CASE SCHEDULE

18 The parties, by and through their respective counsel of record, hereby stipulate and request
19 that the Court enter an order extending the following deadlines:

Event	Prior Date	Amended Date
Reports from expert witness under FRCP 26(a)(2) due	March 19, 2024	May 3, 2024
Discovery completed by	April 18, 2024	June 14, 2024
All dispositive motions must be filed by	May 20, 2024	July 5, 2024

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1 The reason for this request is that additional time is needed for discovery and expert
2 disclosure. Plaintiff's counsel has trials scheduled to take place in April and June, and the extended
3 discovery schedule will allow both sides more flexibility in scheduling the required depositions and
4 ensure that discovery is completed in a timely manner. The trials are scheduled in the cases of Gratton
5 v. City Tukwila et. al., case no. 2:22-cv-01598-TL and Orozco v. Yakima Sheriff's Office et al., case
6 no. 1:22-cv-03058-SMJ.

7 This is the parties' first request for an extension of the case schedule. The requested extension
8 does not affect the trial date or any trial-related deadlines set forth in this Court's Order Setting Trial
9 Dates And Related Dates (Docket #16).

10 Based on the foregoing, good cause exists to extend the requested deadlines and the parties
11 request that the court grant the extension. The parties will comply with all other aspects of the Court's
12 Order Setting Trial Dates And Related Dates (Docket #16).

13 DATED this 31st day of January 2024.

14
15 By /s/ Jesse Valdez
16 Jesse Valdez, WSBA #35378
17 VALDEZ LEHMAN, PLLC.
18 Co-Counsel and Attorney for Plaintiff
19 Jason Fuhr, et. al.

20 DATED this 31st of January 2024.

21 Agreed to by: /s/ Rebecca Widen
22 Rebecca Widen, WSBA# 57339
23 Seattle City Attorney's Office
 701 Fifth Avenue, Suite 2050
 Seattle, WA 98104
 Attorney for Defendants

STIPULATED MOTION TO
EXTEND CASE SCHEDULE - 2
(2:23-cv-00600 BJR)

Ann Davison
Seattle City Attorney
701 5th Avenue, Suite 2050
Seattle, WA 98104-7095
(206) 684-8200

1
ORDER GRANTING IN PART

2
Based upon the foregoing Stipulation, the Court GRANTS the Motion to Extend Case Schedule
3 to the extent outlined below. **NOTE the dates are not those requested by the parties;** if a longer
4 extension is desired, the parties shall provide good cause therefor and propose a new trial date.
5 Accordingly, IT IS HEREBY ORDERED that the Order Setting Trial Dates And Related Dates (Docket
6 #16) shall be, and hereby is, amended as follows:

Event	Prior Date	Amended Date
Reports from expert witness under FRCP 26(a)(2) due	March 19, 2024	April 16, 2024
Discovery completed by	April 18, 2024	May 23, 2024
All dispositive motions must be filed by	May 20, 2024	June 7, 2024

12
All other deadlines set forth in the Order Setting Trial Dates And Related Dates (Docket #16)
13 shall remain intact.

14 Dated this 1st day of February, 2024.

16 
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18 Barbara Jacobs Rothstein
U.S. District Court Judge